

# EXHIBIT A

DETAINED

Alice Miller Chief Counsel  
 Numa V. Metoyer Deputy Chief Counsel  
 Heather Cooley Assistant Chief Counsel  
 U.S. Immigration and Customs Enforcement  
 U.S. Department of Homeland Security  
 830 Pinehill Road  
 Jena, Louisiana 71342

UNITED STATES DEPARTMENT OF JUSTICE  
 EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
 IMMIGRATION COURT  
 JENA, LOUISIANA

\_\_\_\_\_  
 In the Matter of: )  
 )  
 )  
 Petrova, Kseniia )  
 ) File No. A 240 485 724  
 )  
 )  
 In removal proceedings )  
 )  
 \_\_\_\_\_

Immigration Judge: Richard Jacobs
 Next hearing: June 2, 2025

DEPARTMENT OF HOMELAND SECURITY  
 MOTION FOR EXTENSION OF DEADLINE TO FILE  
 RESPONSE TO RESPONDENT’S MOTION FOR CHANGE OF VENUE

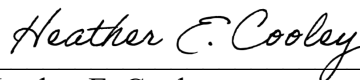
**DEPARTMENT OF HOMELAND SECURITY**  
**MOTION FOR EXTENSION OF DEADLINE TO FILE**  
**RESPONSE TO RESPONDENT'S MOTION FOR CHANGE OF VENUE**

The U.S. Department of Homeland Security (DHS) by and through the undersigned counsel respectfully requests the Immigration Judge to grant DHS an extension to June 5, 2025 to respond to the respondent's motion for change of venue filed on May 23, 2025. "The Immigration Judge may...extend time limits for making motions and replies thereto." 8 C.F.R. § 1003.23(a) (2025); see also Immigration Court Practice Manual, Chapter 3.1(c)(4). The decision to extend the deadline for filing a motion lies with the discretion of the Immigration Judge. *See Matter of C-*, 8 I&N Dec. 577, 579 (BIA 1960).

DHS's response to the respondent's motion to change venue is due on May 26, 2025. The respondent has a *Mapp* hearing schedule in United States District Court, District of Vermont, on May 28, 2025 and the outcome of that hearing will determine whether a change of venue of her immigration court proceeding is proper.

In sum, the above-referenced circumstances of this case present good cause for an extension of time for DHS to file a response to the respondent's motion for change of venue. Accordingly, DHS respectfully moves the Immigration Judge to extend the filing deadline to June 5, 2025.

Respectfully submitted on this the 23<sup>rd</sup> day of May 2025,



\_\_\_\_\_  
Heather E. Cooley  
Assistant Chief Counsel  
U.S. Department of Homeland Security  
U.S. Immigration & Customs Enforcement  
830 Pinehill Road  
Jena, Louisiana 71342